

**LAW OFFICES OF THOMAS K. CROWE, P.C.**

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September 26, 2008

**BY ELECTRONIC SUBMISSION**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, S.W., Suite TW-A325  
Washington, DC 20554

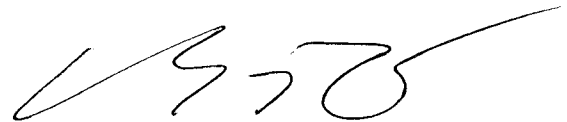
Re: CPNI Certification due March 1, 2008; EB Docket No. 06-36

Dear Ms. Dortch:

Lucky Communications, Inc. ("Company"), by its undersigned attorneys, hereby submits its CPNI compliance certificate and accompanying statement ("Certification"), certifying compliance with Section 64.2001 *et seq.* of the Commission's rules. The Company requests that the Commission waive the March 1, 2008 filing deadline contained in 47 C.F.R. 64.2009(e) and accept the Company's Certification as timely filed. Acceptance of the Certification as timely filed will further the public interest and the Commission's goal of ensuring that companies have adequate procedures to ensure compliance with its CPNI requirements.

Should you require further information, please contact the undersigned.

Respectfully submitted,



Thomas K. Crowe  
Cheng-yi Liu,  
Counsel for Lucky Communications, Inc.

Enclosures

cc: FCC Enforcement Bureau, Telecommunications Consumers Division,  
445 12th Street, SW, Washington, DC 20554 (2 copies via U.S. mail)

Best Copy and Printing, Inc. (via email at [fcc@bcpiweb.com](mailto:fcc@bcpiweb.com))

Annual 64.2009(e) CPNI Certification for 2007

Date filed: September 24, 2008

Name of company covered by this certification: Lucky Communications, Inc.

Form 499 Filer ID: 821218

Name of signatory: Ruell Medina

Title of signatory: President

I, Ruell Medina, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. S: 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed

A handwritten signature in dark ink, appearing to read "Ruell Medina", is written over a horizontal line.

## Lucky Communications CPNI Policies updated 2007

### Description:

Lucky Communications, Inc. is a prepaid telephone card company provider that offers prepaid phone cards to end users and resellers. We do not store any information about our users and tie in any of the information of their account for purpose other than billing reconciliation of our underlying carriers for the calls that were completed over our network. This information does not tie into any personally identifiable information of our end users.

### Policies to Protect CPNI data:

- 1) Lucky Communications, Inc. enforces strict policy against giving customer information to third parties. Such information shall never be sold or disclosed to other parties, unless requested by government agencies requesting for such data as ordered by court or regulatory matters.
- 2) Any changes to the CPNI policy should be first approved by the Board of the company only after being reviewed to be in full compliance of FCC requirements.

### Security of Data:

- 1) Only employees who are instructed to provide customer support can access customer data. Employee can only search customer information by the customer's name, and system does not allow batches of data to be accessed at once. Customer support can only access information needed to service customer support.
- 2) Database is only accessible by senior management and is secured with Firewall. Premise for equipment is maintained and physically secure in our main office which is only accessible to employees screened by Lucky Communications management.

### Integrity of CPNI data compliance:

- 1) Lucky Communications acknowledges that information it has on customers is very limited due to the fact that more than 80% of its customer call information is limited in detail due to the fact that plastic phone cards do not have personally identifiable information to our relationship with the end user. Even in such a case of having information such as caller ID and destination numbers, using such information in a manner in violation of the CPNI protection would be detrimental to our goal to be a reputable phone card service provider.
- 2) Marketing firms will have no need for such limited customer data due to the fact that the telephone numbers have no relevant information to be used for marketing purpose. Should it be determined that call information being linked back to call origination is useful, we feel that this information should not be

Procedures if CPNI policy broken:

- 1) If database security is compromised or an internal employee had misused information, a report will be filed with local and federal agencies to first safeguard the data of customers to properly take action to the reported breach of data.
- 2) Full cooperation with local, state, and federal agencies will be given by Lucky Communications in the even CPNI policies were broken.
- 3) Full investigation will be done to eliminate cause of such CPNI infraction.
- 4) Review of CPNI policy to assure such occurrences do not reoccur.